

KENNY C. GUINN  
Governor

CAROL A. JACKSON  
Director

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JUN 13 2000

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STATE OF NEVADA



ORIGINAL

MAYNARD YASMER  
Administrator

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DEPARTMENT OF EMPLOYMENT, TRAINING AND REHABILITATION  
REHABILITATION DIVISION  
OFFICE OF COMMUNITY BASED SERVICES

Nevada Council on  
Developmental  
Disabilities

Nevada Council on  
Independent Living

Nevada Council on  
Assistive Technology  
Project

Personal Assistance  
Services

Nevada Tele-  
Communications  
Program and  
Deaf Services

Traumatic Brain  
Injury Services

June 8, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Ex Parte Communication*: CC Docket No. 98-67, Telecommunications  
Relay Services and Speech-to-Speech Services for Individuals with  
Hearing and Speech Disabilities

Dear Ms. Salas,

This afternoon I spoke with Jamal Mazrui regarding our efforts to implement 711 dialing for TRS in Nevada. During that conversation I was asked to submit a brief statement regarding the 711 implementation process. Attached please find a letter I have sent to Karen Peltz-Strauss as further Ex Parte Communication regarding our experience as the provider of Relay Services in Nevada and 711 dialing.

Thank you for handling this filing and should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Butterworth".

Todd Butterworth, Administrator  
Relay Nevada

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Karen Peltz-Strauss  
Deputy Chief  
Consumer Information Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington D.C. 20554

Re: *Ex Parte Communication*: CC Docket No. 98-67,  
Telecommunications Relay Services and Speech-to-Speech Services for  
Individuals with Hearing and Speech Disabilities

Dear Ms. Peltz-Strauss,

On April 1, 2000, Nevada became the 4<sup>th</sup> state to offer 711 access for Relay users. Relay Nevada wishes to submit the following information regarding our experience, thus far, with 711 dialing. While we have only been offering 711 for two months, we hope that our experience may be useful to the Commission as it contemplates further implementation of 711. If you desire additional information, please do not hesitate to contact me.

Our experience in Nevada was quite positive. Our total timeline for 711 implementation was three and a half months. In mid-December a letter was sent to the 650+ companies authorized to provide dial tone in Nevada. These companies were asked to voluntarily offer 711 dialing as a community service. Companies were asked to voice any concerns or objections—none were received. A follow-up letter was sent in February and, again, no concerns or objections were raised.

Unlike other states that have implemented 711, Nevada has 16 CLECs. So, a conference call was organized between Sprint TRS and the 16 CLECs, with me as moderator. I advised the group that 711 is not mandated by the either FCC or the Nevada PUC, but, by implementing it on our own timeframe and of our own free will, that we would be able to test the system and "work out the bugs" without legal pressure to perform. We spent a little time discussing the technical aspects of making the switch and thanked the companies for their willingness to "do the right thing." All 16 companies made the switch on April 1.

(888) 337-3839 Toll Free  
(775) 687-3388 / TTY  
(775) 687-3292 / Fax

*Services in the Community  
by Community Providers*

711 S. Stewart Street  
Carson City, Nevada 89701  
(775) 687-4452 / Voice

The process really was that easy. Our governor held a press conference and made the first official call on 711. As yet, we have not undertaken a formal marketing campaign to publicize 711, but we hope to within the next year.

Here is some additional information about 711 in Nevada:

- Answer Protocol: Voice, then TTY. In order to guard against hearing callers hanging up on TTY tones, we felt that this would be the best answer protocol.
- All 800 numbers preserved: Both the TTY and Voice 800 numbers will remain intact.
- Profiles honored: In order to speed connection for TTY or VCO users who choose to dial 711, Relay Nevada users may set up an answer profile tied to their ANI (Automatic Number Identification). Once the profile is in place, when the TTY or VCO user dials 711, their call is automatically answered in whichever mode they have selected TTY, VCO or HCO. There is no need for the caller to wait until the Relay Operator voices the greeting.
- STS answer protocol: STS callers can use 711. Because the STS user will hear the Operator voice the Relay greeting, they can then request STS and be transferred to a qualified STS Operator (if the answering Operator cannot handle the call). While this may not result in the fastest connection for the STS caller (if their call must be transferred) it would eliminate the need to remember or dial a 10-digit number to reach Relay, thus easing access for those STS consumers who may have difficulty with those tasks.
- Call Volume: Relay Nevada has offered 711 service for just over 2 months. We do not feel that this is enough data to analyze and extrapolate the service's effect on call volume. Because other factors (seasonal influences, etc.) also cause call volume to fluctuate, we believe that a longer period of time is needed to truly gauge 711's impact.
- Consumer Feedback: All of the feedback we have received from consumers has been positive. The benefit most often mentioned is the ease with which TTY users can instruct hearing persons (either in conversation, on business cards or on answering machines) how to contact them via Relay.

I hope that our experience with 711 at Relay Nevada will be helpful to the Commission as it considers furthering the development of this useful access tool. In the interest of interstate consistency, I urge the Commission to consider mandating 711 dialing. Please contact me if I can be of any further assistance.

Sincerely,



Todd Butterworth, Administrator  
Relay Nevada